

## SAFETY REGULATION GROUP

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### VIA DMS

Our Ref: 9/61/10CD

22<sup>nd</sup> January 2001

Docket Management System (DMS)  
US Department of Transportation Dockets  
Room Plaza Level 401,  
400 Seventh Street SW  
Washington DC 20590-0001

Dear Sir,

#### **Attention Rules Docket No: FAA-2000-8017 Safe Disposition of Life-Limited Aircraft Parts**

Please accept the comments given below on the Notice of Proposed Rulemaking.

It is assumed that 'Life Limited Aircraft Parts' includes life limited engine parts.

CAA concurs with the objective of reducing the number of inappropriately fitted life limited parts. However, CAA believes that the NPRM should be developed further to address the particular subject of critical rotating engine parts. These parts, through not being conducive to life control by means of tagging or marking, have a need for very tight documentary control. It is assumed that 'tagging', in the context of this NPRM, means attachment to the part of a plate, or similar, which remains on the part while in service. A further paragraph (b)(6) should be included specifically to address this method of life control. This could be developed in conjunction with the FAA's Engine Certification Office.

Under "Current Requirements", it is stated that "Persons who install parts do not always have adequate information to determine a part's current life status." This implies that, nevertheless, the person concerned, in the absence of adequate information, could be excused for fitting the part. This is obviously not the case and the NPRM should state quite clearly that it is the installer's responsibility to ensure that a part is serviceable before it is installed. This includes the need to be satisfied that the life available on all life-limited parts is sufficient for the intended period of installation.

Editorial Comment: In background: para (c) appears to be missing

Thank you for the opportunity to take part in your rulemaking process.

Yours faithfully,

M Poole

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Requirements and Policy Unit